

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANNA LA FRONZA, and NATALIA)	
KUPIEC, individually and on behalf of all)	
others similarly situated,)	Case No. 1:21-cv-00280
)	
Plaintiffs,)	Hon. Judge Edmond E. Chang
)	
v.)	Magistrate Judge M. David Weisman
)	
PEOPLECONNECT, INC., and INTELIIUS)	
LLC,)	
)	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7.1, Defendants PeopleConnect, Inc. and Intelius LLC (“Defendants”), by and through their undersigned attorneys, respectfully move for leave to file Defendants’ Memorandum of Law in Support of their Motion to Dismiss Plaintiffs’ Second Complaint Pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6) in excess of 15 pages. Defendants’ deadline to answer or otherwise plead is June 23, 2021. Defendants will be filing a renewed motion to dismiss.¹ Their memorandum of law in support of their original

¹ Plaintiff Anna La Fronza filed her original complaint against Defendants on January 15, 2021. (Dkt. No. 1.) Plaintiff Natalia Kupiec filed her original complaint against Defendants on February 19, 2021. *Kupiec v. PeopleConnect et al*, No. 21-cv-968 (N.D. Ill.) On March 23, 2021, Defendants moved to reassign and consolidate the cases. (Dkt. No. 17.) While the motion to consolidate was pending, Defendants moved to dismiss La Fronza’s complaint on March 29, 2021, the due date for a responsive pleading. (Dkt. Nos. 21, 22.) On April 6, 2021, this Court issued an order terminating Defendants’ first Motion to Dismiss pending the resolution of Defendants’ Motion to Reassign and Consolidate. (Dkt. No. 27.) On April 19, 2021, Kupiec voluntarily dismissed her case, and La Fronza amended her complaint to add Kupiec as a plaintiff as well as additional claims and additional defendants. (Dkt. No. 29.) On May 3, 2021, this Court issued an order instructing Parties to brief the severance issue before filing any dismissal motions. (Dkt. No. 34.) On May 17, 2021, Defendants moved to sever the claims brought against other defendants from this case. (Dkt. No. 39.) On May 27, 2021, the Court issued an order “encourag[ing] the

motion to dismiss was 29 pages as permitted by the Court. (Dkt. Nos. 20, 22.) Defendants request 25 pages for their memorandum of law in support of their renewed motion to dismiss. In support of this motion, Defendants state as follows:

1. Defendants' motion to dismiss will combine several arguments which would each support standalone motions, including arguments which would support dismissal pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6). That includes a motion to compel arbitration pursuant to a Terms of Service provision.

2. Despite Defendants' best efforts in working carefully to prepare an efficient memorandum of law in support of their renewed motion to dismiss, Defendants require 10 additional pages to adequately address all issues presented in Plaintiffs' amended complaint.

3. On June 14, 2021, Defendants' counsel conferred with Plaintiffs' counsel on this matter. Plaintiffs' counsel did not object to Defendants seeking an enlargement to 25 pages for their memorandum of law in support of the motion to dismiss that they will be filing Wednesday.

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter an order granting Defendants leave to file their memorandum of law in support of their forthcoming motion to dismiss not to exceed 25 pages.

Plaintiffs to closely examine whether getting the case hung up on a joinder dispute is worth the delay." (Dkt. No. 44.) On June 2, 2021, La Fronza and Kupiec filed the Second Amended Complaint, lodged against only Defendants. (Dkt. No. 46.)

Dated: June 21, 2021

Respectfully Submitted,

PEOPLECONNECT, INC., and INTELIIUS LLC

By: /s/ Wade A. Thomson

Wade A. Thomson, #6282174
Debbie L. Berman, #6205154
Clifford W. Berlow, #6292383
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: 312 222-9350
Facsimile: 312 527-0484
wthomson@jenner.com
dberman@jenner.com
cberlow@jenner.com

Ian Heath Gershengorn (*pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001-4412
Telephone: 202 639-6000
Facsimile: 202 639-6066
igershengorn@jenner.com

*Attorneys for Defendants PeopleConnect, Inc., and
Inteliius LLC*

CERTIFICATE OF SERVICE

I, Wade A. Thomson, certify that on June 21, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Wade A. Thomson
Wade A. Thomson